DISTRICT OF DELAWARE	
INEOS FLUOR AMERICAS LLC,)
Plaintiff,)
v.) C.A. No. 06-189 (SLR)
HONEYWELL INTERNATIONAL INC.,)
Defendant.)

UNITED STATES DISTRICT COURT

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant Honeywell International, Inc. will take the deposition upon oral examination of *Robert Learman*, Chief Executive Officer, INEOS Oligomers, beginning at 9.00 a.m. on December 11 2006 at the offices of Morris, Nichols, Arstht & Tunnell LLP, 1201 North Market Street, Wilmington, DE 19899.

The oral examination will be recorded by stenographic and videographic means, will take place before a notary public or other person authorized by law to administer oaths, and will continue from day to day until completed.

You are invited to attend and examine the witness.

Dated: October 20, 2006

Of Counsel:

KIRKLAND & ELLIS LLP

Yosef J. Riemer Mark L. Kovner Michael S. Becker Andrew R. Dunlap Michael D. Reisman

Citigroup Center 153 East 53rd Street New York, NY 10022 Tel: (212) 446-4800

655 Fifteenth Street, NW Suite 1200 Washington, DC 20005 Tel: (202) 879-5000

Attorneys for Honeywell International, Inc.

/s/ Jason A. Cincilla

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

Martin P. Tully (#465) Jason A. Cincilla (#4232) 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899 Tel: (302) 658-9200

Attorneys for Honeywell International, Inc.

CERTIFICATE OF SERVICE

I, Jason A. Cincilla, Esquire, hereby certify that copies of the foregoing **NOTICE OF DEPOSITION** were served by my co-counsel on October 20, 2006 as follows:

BY ELECTRONIC MAIL:

Richard S. Order, Esq. Axinn, Veltrop & Harkrider LLP 90 State House Square, 11th Floor Hartford, Connecticut 06103 rso@avhlaw.com

I further certify that copies of the foregoing **NOTICE OF DEPOSITION** were served on October 24, 2006 as follows:

BY ELECTRONIC FILING:

C. Barr Flinn, Esq.
Karen L. Pascale, Esq.
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street, 17th Floor
P. O. Box 391
Wilmington, DE 19899-0391

/s/ Jason A. Cincilla		
Jason A. Cincilla (#4232)		